

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF VERMONT

ANNESSA LEWIS,
Plaintiff,

v.

BELLOWS FALLS CONGREGATION OF)
JEHOVAH'S WITNESSES, BELLOWS)
FALLS VERMONT, INC.,)
WATCHTOWER BIBLE AND TRACT)
SOCIETY OF NEW YORK, INC., and)
NORTON TRUE,)
Defendants.)

Civil Action No. 1:14-cv-205

AFFIDAVIT OF BARBARA R. BLACKMAN, ESQ.
PURSUANT TO F.R.C.P. 26(c)(1) and L.R. 26(d)(2)

1. My name is Barbara R. Blackman. My law firm is counsel of record for the Defendant Watchtower Bible and Tract Society of New York, Inc ("Watchtower").
2. My firm has attempted to confer with Plaintiff's counsel in an effort to resolve this dispute without court intervention.
3. Attached hereto as Exhibit "B" is a true and correct copy of Plaintiff's First Set of Requests for Production of Documents to Defendant Watchtower Bible and Tract Society of New York, Inc. propounded to Watchtower ("Plaintiff's RFP").
4. Attached hereto as Exhibit "C" is a true and correct copy of Watchtower's response to Plaintiff's RFP.
5. In its response to RFP 65 Watchtower set forth several objections and stated that "Watchtower intends to file a protective order related to this request which will more fully describe the nature and content of the responses it received to the letter to all bodies of elders dated March 14, 1997." Exhibit "C."


6. In its response to RFP 67 Watchtower set forth several objections and stated that
“Watchtower intends to file a protective order related to this request which will more
fully describe the overly burdensome nature of this request.” Exhibit “C.”
7. On Friday, September 18, 2015, my partners Pietro J. Lynn and Andrew D. Manitsky
met with Plaintiff’s counsel to address discovery matters including Watchtower’s
Responses to RFP 65 and 67. The meeting took place at my law firm and lasted
approximately 45 minutes.
8. On Thursday, October 8, 2015, I met with Plaintiff’s counsel and Attorney Walter E.
Judge, Jr. and Attorney Jennifer E. McDonald in an effort to resolve or reduce our
discovery dispute. The meeting took place at my law firm. The meeting lasted
approximately an hour. Following this meeting, several issues remained unresolved,
including Plaintiff’s RFP 65 and 67 and Watchtower’s responses thereto.

Dated in Burlington, Vermont this 9th day of October, 2105.



Barbara R. Blackman, Esq.

Subscribed and sworn to before me this 9th day of October, 2015.



Notary Public
Commission Expires: 2/2019